III. REMARKS

1. Claims 1, 2, 6-9, 11, 13-15,19, 20, 24-27, 29, 32, 33, 37-43, 54-73, and 84 remain in the application. Claims 3-5, 10, 12, 16-18, 21-23, 28, 30, 31, 34-36, 44-53, and 74-83 have been cancelled without prejudice. Claims 1, 19, 37-43, 54-57, 68, 69, 70, and 84 have been amended.

2. Applicants respectfully submit that claims 1, 2, 6-9, 11, 13-15, 19, 20, 24-27, 29-, 32, 33, 37-43, 54-73, and 84 are not anticipated by Kalevo et al. (WO 98/41025, "Kalevo") under 35 USC 102(b).

Kalevo fails to disclose or suggest

> performing an adaptive block boundary filtering operation on a block boundary formed between a first decoded image block on a first side of the block boundary and a second decoded image block on a second side of the block boundary, the first decoded image block having been encoded using a first type of prediction encoding method and the second decoded image block having been encoded using a second type of prediction encoding method,
>
> wherein at least one parameter of the filtering operation is determined based on the types of the first and second prediction encoding methods,
>
> and wherein the first and second type of prediction encoding method is selected from a group of prediction encoding methods comprising at least: intra coding, copy coding, motion-compensated prediction coding, and not-coded coding,

as substantially recited by the independent claims.

Applicant respectfully maintains that Kalevo fails to disclose or suggest that at least one parameter of the filtering operation is determined based on the types of the first and second prediction encoding methods.

Applicant again refer to page 4, lines 9-20 of Kalevo where it is disclosed that the number of pixels to be corrected, the characteristic features of the filter being used, and the size of the filtering window depend on a) the difference of pixel values across the block boundary, b) the

size of the quantization step QP of the coefficients received as the result of the transformation used in the coding, and c) the differences of the pixel values between the pixels on the same side of the block boundary.

It is clear that the selection of the value of the parameter n is dependent on the difference of pixel values across the block boundary and the size of the quantization parameter QP. However, the quantization parameter QP is not selected on the basis of a predictive encoding method. Kalevo gives no details on the operation of the motion compensation and prediction block 17 except for page 1, lines 16-20 that disclose that the frame saved in the frame memory is read as a reference frame and in the motion compensation and prediction block 17 the frame is transformed into a new prediction frame according to the formula (1).

Applicants note on page 3 of the present action, the Examiners reference to item 33 in Figure 3 of Kalevo as disclosing Applicant's filtering process. Applicants find no disclosure in Kalevo that discloses determining a parameter of the filtering operation based on the types of the prediction encoding methods. Nowhere does Kalevo discuss a coding method used as part of a filtering operation.

At least for these reasons, Applicants submit that Kalevo does not anticipate independent claims 1, 19, 37-43, 54-57, 68-70, and 84 and dependent claims 2, 6-9, 11, 13-15, 20, 24-27, 29-, 32, 33, 58, 59, 60-67, and 71-83.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,

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